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26 Los Angeles Waterkeeper

27 UNITED STATES DISTRICT COURT

28 FOR THE CENTRAL DISTRICT OF CALIFORNIA

19 LOS ANGELES WATERKEEPER, a
20 non-profit corporation,

21 Plaintiff,

22 v.

23 PRESS FORGE COMPANY, a
24 corporation,

25 Defendant.

26 Case No. 2:17-CV-02228-JFW(PLAx)

27 **JOINT NOTICE OF LODGING OF
28 [PROPOSED] CONSENT DECREE
AND REQUEST FOR ENTRY**

29 (Federal Water Pollution Control Act, 33
U.S.C. §§ 1251 to 1387)

30 Courtroom: 7A
31 Judge: Hon. John F. Walter

1 TO THE HONORABLE COURT:

2 On February 20, 2018, Plaintiff Los Angeles Waterkeeper (“Plaintiff”) and
3 Defendant Press Forge Company (“Defendant,” and with Plaintiff collectively, the
4 “Parties”) jointly notified the Court of the settlement of this federal Clean Water
5 Act matter. *See* ECF Doc. No. 27. The Parties further advised the Court that, as
6 required by the Clean Water Act and its implementing regulations, Plaintiff had
7 submitted the [Proposed] Consent Decree to the Administrator of the United States
8 Environmental Protection Agency (“EPA”), the Regional Administrator of the EPA
9 and the United States Attorney General Citizen Suit Coordinator (collectively “the
10 Agencies”) for the Agencies’ required 45-day review under 33 U.S.C. § 1365(c)
11 and 40 C.F.R. § 135.5.

12 The Court has set April 23, 2018 at 1:30 p.m. for a hearing on an Order to
13 Show Cause re: Entry of the [Proposed] Consent Decree. *See* ECF Doc. No. 28.

14 On April 16, 2018, the Agencies notified the Court and the Parties that they
15 had reviewed the [Proposed] Consent Decree and that they did not object to entry of
16 the [Proposed] Consent Decree. *See* ECF Doc. No. 29.

17 The [Proposed] Consent Decree is lodged herewith for the Court’s
18 consideration and requested entry on page 24. Among other things, the [Proposed]
19 Consent Decree ¶¶ 11, 17-18 requires Defendant to implement stormwater best
20 management practices at its facility that are designed to meet applicable water
21 quality standards for stormwater run-off. The [Proposed] Consent Decree also
22 includes a request in ¶ 38 that the Court retain jurisdiction to enforce the terms of
23 the [Proposed] Consent Decree if necessary.

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1 The Parties respectfully request that the Court enter the [Proposed] Consent
2 Decree.
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5 DATED: April 16, 2018

STOEL RIVES LLP

6
7 By: /s/ per L.R. 5-4.3.4
8 MICHAEL N. MILLS
9 SHANNON L. MORRISSEY
ATTORNEYS FOR DEFENDANT
PRESS FORGE COMPANY

10
11 DATED: April 16, 2018

LAW OFFICE OF GIDEON
KRACOV

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GIDEON KRACOV
Attorney for Plaintiff LOS
ANGELES WATERKEEPER

Pursuant to Local Rule 5-4.3.4, the filer of this document attests that all of the
signatories listed, and on whose behalf the filing is submitted, concur in the
filing's content and have authorized the filing.

PROOF OF SERVICE

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I, Gideon Kracov, being duly sworn, deposes and says:

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5 I am a citizen of the United States and work in Los Angeles County, California. I am over the age
of eighteen years and am not a party to the within entitled action. My business address is: 801 S.

6 Grand Ave., 11th Fl., LA, CA 90017. On 4/16/18, I served this list of persons with the following
document(s):

7

8 **Notice Lodging and Request to Enter Proposed Consent Decree; Proposed Consent Decree**

9 The document(s) was served on:

10 MICHAEL N. MILLS (SB #191762)

michael.mills@stoel.com

11 SHANNON L. MORRISSEY (SB #307144)

shannon.morrissey@stoel.com

12 STOEL RIVES LLP

13 500 Capitol Mall, Suite 1600
Sacramento, CA 95814

14

15 ATTORNEYS FOR Defendant PRESS FORGE

16 X by transmitting via electronic mail the document(s) listed above to the e-mail
addresses set forth herein on this date.

17

18 I declare under penalty of perjury, according to the laws of the State of California, that the
foregoing is true and correct.

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20 Executed this 4/16, 2018 at Los Angeles, California

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Gideon Kracov

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